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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION
PLAINTIFF-APPLICANT,

ADV. PRO. No. 08-01789 (BRL)
SIPA LIQUIDATION

V.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC

DEFENDANTS

IN RE:

BERNARD L. MADOFF,

DEBTOR.

IRVING H. PICARD, TRUSTEE FOR THE
LIQUIDATION OF BERNARD L. MADOFF
INVESTMENT SECURITIES, LLC
PLAINTIFF,

ADV. PRO. No. 10-04311

V.

ANDREW H. COHEN

DEFENDANT.

**DEFENDANTS' NOTICE OF MOTION
TO EXTEND TIME TO FILE
OBJECTIONS PURSUANT TO RULE
9003.**

PLEASE TAKE NOTICE that the Defendant represented by the undersigned counsel in the adversary proceeding before the United States Bankruptcy Court, Southern District of New York (the “Defendants”), respectfully move the United States Bankruptcy Court Southern District of New York for entry of an order, pursuant to 28 U.S.C. § 157 and Federal Rule of Bankruptcy Procedure 9003 extending Defendant’s time to file objections to the Court’s Proposed Findings of Law and Fact, for the reasons set forth in the accompanying Letter Brief and exhibits thereto, which are hereby incorporated by reference.

The Defendants have made no prior request to this Court or to any other court for the relief requested by this Motion.

WHEREFORE, the Defendants respectfully request that the Court enter an order granting the relief requested herein, and such other and further relief as the Court deems just and appropriate.

/s Gregory Goett
Gregory Goett (GG3774)
Lewis & McKenna
Counsel for Defendant
Andrew H. Cohen

Dated: April 28, 2016